

TO: Registered Agent Department
Business Filings Incorporated (Recipient Account Only)
8020 Excelsior Dr Ste 200
Madison, WI 53717-1998

RE: Process Served in Alaska

FOR: PROVIDENCE HEALTH & SERVICES (Domestic State: WA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Ruth C. Morrison, Pltf. vs. Providence Health & Services, et al., Dfts.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # 3AN2008566CI

NATURE OF ACTION: Medical Injury - Improper Care and Treatment

ON WHOM PROCESS WAS SERVED: Business Filings Incorporated, Juneau, AK

DATE AND HOUR OF SERVICE: By Regular Mail on 01/08/2021 postmarked on 01/06/2021

JURISDICTION SERVED : Alaska

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 01/08/2021, Expected Purge Date: 01/13/2021

Image SOP

Email Notification, Registered Agent Department ctsop@bizfilings.com

REGISTERED AGENT ADDRESS: Business Filings Incorporated
9360 Glacier Highway
Suite 202
Juneau, AK 99801

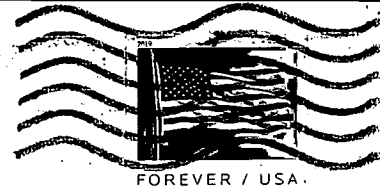
866-203-1500
DealTeam@wolterskluwer.com

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Farnsworth & Vance
2525 Gambell Street #410
Anchorage, AK 99503

ALASKAN FRONTIER
995-997
6 JAN 2021 PM 1 L



Business Filings Incorporated
9360 Glacier Hwy Ste 202
Juneau, AK 99801



IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA
AT ANCHORAGE

Ruth C. Morrison

Plaintiff(s),

vs.

Providence Health & Services,
Anchorage Fracture & Orthopedic
Clinic, J. Lapkass, MD & K. Thomas, MD
Defendant(s).

CASE NO. 3AN- 20-08566 CI

**SUPPLEMENTAL
SUMMONS AND
NOTICE TO BOTH PARTIES
OF JUDICIAL ASSIGNMENT**

To Defendant: Providence Health & Services

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at 825 W. 4th Ave., Anchorage, Alaska 99501 within 20 days* after the day you receive this summons. In addition, a copy of your answer must be sent to the plaintiff's attorney or plaintiff (if unrepresented)

EARNSWORTH & VANCE, whose address is:

2525 GAMBELL ST. SUITE 410, ANCHORAGE, AK 99503

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at <http://www.courts.alaska.gov/forms/index.htm> to inform the court. - OR - If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

NOTICE OF JUDICIAL ASSIGNMENT

TO: Plaintiff and Defendant

You are hereby given notice that:

- ☐ This case has been assigned to Superior Court Judge Dani Crosby and to a magistrate judge.
- ☐ This case has been assigned to District Court Judge _____.

CLERK OF COURT

By: [Signature]
Deputy Clerk

12.29.2020
Date



I certify that on 12.29.20 a copy of this Summons was ☒ mailed ☐ given to
☐ plaintiff ☒ plaintiff's counsel along with a copy of the
☐ Domestic Relations Procedural Order ☐ Civil Pre-Trial Order
to serve on the defendant with the summons.
Deputy Clerk [Signature]

* The State or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.

CIV-100 ANCH (10/13)(cs)
SUMMONS

Civil Rules 4, 5, 12, 42(c), 55

DEC 28 2020

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

RUTH C. MORRISON,

Plaintiff,

vs.

PROVIDENCE HEALTH & SERVICES, ANCHORAGE
FRACTURE AND ORTHOPEDIC CLINIC, PC,
JOHN LAPKASS, MD, & KENNETH THOMAS, MD,

Defendant.

Case No. 3AN-20- 00566 CI

COMPLAINT

1. Plaintiff is a resident of Georgia who was visiting Anchorage, Alaska at the times complained of.

2. Providence Health & Services is a corporation doing business in Anchorage, Alaska as Providence Alaska Medical Center.

3. Anchorage Fracture and Orthopedic Clinic, PC is professional corporation offering orthopedic surgery services in Anchorage, Alaska.

4. John Lapkass, MD and Kenneth Thomas, MD are orthopedic surgeons employed by Anchorage Fracture and Orthopedic Clinic.

5. In September of 2018, plaintiff came to Alaska to visit her daughter. On arrival she twisted her knee and sought medical attention. She was referred to Anchorage Fracture and Orthopedic clinic where it was determined that she needed a knee replacement, a total knee arthroplasty.

6. On October 31st, 2018 Dr. Lapkass performed the knee replacement surgery at Providence Hospital.

7. Following surgery, plaintiff developed an infection in the knee. On November 7th, 2018 plaintiff returned to Providence Hospital with excess drainage from the surgical site and extreme pain. She was seen on November 8th, 2018 at Anchorage Fracture and Orthopedic Clinic with symptoms of an infection, but an infection was not diagnosed or treated. Again, on November

9th, 2018 she visited Providence with continued drainage and extreme pain and was told that this was a symptom of the surgery. She was seen again at Providence on November 15th, 2018 with more symptoms of an infection, but the infection was not diagnosed or treated. On November 17th, 2018 she was seen at Providence Hospital where the infection was diagnosed.

8. On November 18th, 2018, Dr. Thomas performed surgery to remove and replace a component of the arthroplasty and to treat the infection with incision and debridement.

9. On November 28th, 2018, plaintiff was discharged from the hospital. Before being discharged she fell, when no one came to assist her when she was leaving the bathroom.

10. On December 4th, 2018, she was readmitted for another surgery by Dr. Lapkass. During this surgery Dr. Lapkass found that plaintiff's quadriceps tendon had been damaged and speculated that this had been caused by her previous surgery or the fall in the hospital.

11. Following the December 4th, 2018 surgery, plaintiff developed another infection, which required yet another surgical procedure. And she was, again admitted to Providence Hospital.

12. On February 1st, 2019 another surgery was performed to remove her knee arthroplasty and place an antibiotic spacer. During this surgery it was discovered that plaintiff had a complete quadriceps tendon tear at its midsubstance and there was a large lateral retinacular disruption.

13. On February 6th, 2019, while being discharged from Providence Hospital a Providence employee was wheeling plaintiff out of the hospital and bumped her leg into something, which fractured her femur.

14. The fractured femur necessitated another surgery.

15. Defendant Providence Alaska Medical Center was negligent by allowing plaintiff to become infected, by failing to diagnose and treat the infection, by not providing assistance to plaintiff when she fell and by breaking plaintiff's femur.

Complaint

Morrison v. Providence Health & Services et al.

Case No. 3AN-20- _____ CI

Page 2 of 3

16. Defendants Anchorage Fracture and Orthopedic Clinic, Dr. Lapkass and Dr. Thomas were negligent be allowing plaintiff to become infected, by negligently failing to diagnose and treat the infection, and by damaging plaintiff's quadriceps tendon.

17. Anchorage Fracture and Orthopedic Clinic is liable for the negligent acts of its employees.

18. Plaintiff has endured and continues to endure extraordinary pain and suffering and will in the future. A portion of plaintiff's leg may be amputated. Plaintiff has incurred in the past, and will incur in the future, medical expenses. Plaintiff has and will suffer loss of enjoyment of life.

WHEREFORE, plaintiff asks that she be given judgment against the defendants and each of them for her damages in an amount to be proved at trial, plus costs, interest and attorneys' fees and such other relief as the Court may deem just.

DATED at Anchorage, Alaska this 22 day of October, 2020.

BOOKMAN & HELM, LLP
Attorneys for Plaintiff

By: 

Richard A. Helm
Alaska Bar No. 7011059

Farnsworth & Vance
2525 Gambell St., Suite 410
Anchorage, AK 99503
Phone: (907) 290-8980
Fax: (907) 290-8695
contact@injuryak.com

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT PALMER**

Ruth C. Morrison

Plaintiff

vs.

Providence Health & Services,
Anchorage Fracture and Orthopedic
Clinic, PC

Defendants.

CASE NO: 3AN-20-08566 CI

SUBSTITUTION OF COUNSEL

COMES NOW the Plaintiff, Ruth Morrison, by and through her attorney Farnsworth & Vance, and does move this court to allow substitution of counsel from the Bookman & Helm, LLP to Farnsworth & Vance.

All documents, pleadings, information or material may be sent to via any format to Jeffrey H. Vance of Farnsworth & Vance at 2525 Gambell Street, Suite 410, Anchorage, Alaska 99503.

RUTH MORRISON VS. PROVIDENCE HEALTH & SERVICES,
ANCHORAGE FRACTURE AND ORTHOPEDIC CLINIC, PC ET AL
SUBSTITUTION OF COUNSEL
CASE NO: 3AN-20-08566 CI

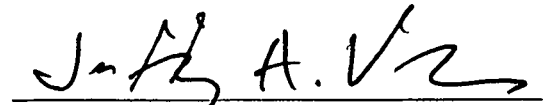
DATED this 11 day of December, 2020 at Anchorage, Alaska.

Bookman & Helm, LLP



Richard Helm
Alaska Bar No. 7011059

Farnsworth & Vance



Jeffrey H. Vance
Alaska Bar No. 0111080

ORDER GRANTING SUBSTITUTION OF COUNSEL

This court hereby approves the Substitution of Jeffrey H. Vance of Farnsworth & Vance as counsel for Ruth Morrison.

DATED: _____

Honorable Dani Crosby
Superior Court Judge

RUTH MORRISON VS. PROVIDENCE HEALTH & SERVICES,
ANCHORAGE FRACTURE AND ORTHOPEDIC CLINIC, PC ET AL
SUBSTITUTION OF COUNSEL
CASE NO: 3AN-20-08566 CI